

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case No. 18-07480-Civ-DDP/MRW

JENNIFER RIBALTA, et al.,

Plaintiffs,

vs.

HERBALIFE, LTD., et al.,

Defendants.

PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME

Plaintiffs, Jennifer Ribalta, Patricia Rodgers, Jeff Rodgers and Izaar Valdes (“Plaintiffs”), respectfully seek an extension of time in which counsel for the Plaintiffs may file their *pro hac vice* application with the Clerk of this Court pursuant to [DE Nos. 111-114], and in support state:

1. On August 23, 2018, Judge Marcia Cooke of the Southern District of Florida held that claims asserted by Plaintiffs against Herbalife Ltd., Herbalife International, Inc., and Herbalife International of America, Inc. (“Herbalife Defendants”) shall be transferred to the Central District of California (DE 106).

2. On August 28, 2018 this Court issued a Notice of *Pro Hac Vice* Applications Due which provided that a Form G-64 must be submitted within 5 business days (DE 111-114).

3. On August 28, 2018, Donald Hayden, Etan Mark and Jason Jones initiated their efforts to comply with the requirements contained in Form G-64.

4. On September 4, 2018, local counsel submitted an Application of Non-Resident Attorney to Appear in a Specific Case *Pro Hac Vice* for both Donald Hayden and Etan Mark (DE 128 and 130).

5. These applications contained a Certificate of Good Standing from the Florida Bar for Donald Hayden and Etan Mark.

6. Donald Hayden has requested Certificates of Good Standing from the Southern District of Florida, Middle District of Florida, Southern District of Illinois, United States Court of Appeals for the Eleventh Circuit, United States Supreme Court and State of Illinois Bar.

7. Etan Mark has requested Certificates of Good Standing from the Southern District of Florida, Middle District of Florida, Southern District of New York, United States Court of Appeals for the Eleventh Circuit, United States Court of Appeals for the Fourth Circuit, United States Supreme Court, Southern District of Florida-Bankruptcy Court, Southern District of New York Bankruptcy Court, United States Tax Court and the State of New York Bar.

8. Jason Jones has requested a Certificate of Good Standing from the State of Ohio Bar.

9. Counsel expect that the various courts and state bars will issue these certificates within 10 days.

10. Accordingly, counsel for the Plaintiffs respectfully seek an extension of time of 10 days in which to supplement their *pro hac vice* applications to allow them to obtain and provide to the Court the currently outstanding Certificates of Good Standing from the aforementioned Courts and State Bars.

11. This motion is filed in good faith and not for purposes of delay.

WHEREFORE, Plaintiffs' respectfully request that the Court enter an Order extending the time in which to file *pro hac vice* applications until September 16, 2018, and for such further relief as the Court deems just and proper.

CERTIFICATION

The undersigned certifies that, before filing this Motion, Etan Mark, Esq., counsel for Plaintiffs conferred with counsel for the Herbalife Defendants, by email on August 29, 2018, and Defendants' counsel advised that Defendants do not oppose to the requested extension of time.

Dated: September 5, 2018

Respectfully submitted,

MORTGAGE RECOVERY LAW GROUP LLP

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 5th day of September 2018, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served on all Defendants in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF, or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: s/ Paul A. Levin
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